

Supporting Planning Statement

Proposed Residential Development
109 Coldharbour Lane, Hayes

July 2022

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1 Introduction

- 1.1 This Supporting Planning Statement accompanies a full planning application for an upward extension to provide 9 new dwellings at 109 Coldharbour Lane, Hayes. The existing building contains 21 residential apartments, with commercial units at the ground floor. The site already has a permitted residential use.
- 1.2 A residential use is acceptable in principle in this location, in the urban area of Hayes, and on top of the existing residential accommodation, subject to detailed matters of design. The Applicant has already engaged the Council's officers in pre-application discussions, and established that the proposed design is also acceptable. It would provide a complementary addition to the existing building, using matching materials and a similar architectural style, and retaining a step-back on its top level.
- 1.3 There is a pressing need for housing, both within Hillingdon, and more widely within London and the South-East. House prices are rising rapidly, and many people are being forced to live further from where they wish to live, or in accommodation which doesn't meet their needs. Only by following the Government's objective of boosting the supply of housing can the current imbalance between supply and demand be remedied. The London Plan has introduced an ambitious new housing target for Hillingdon, which is itself below the level of housing which is actually needed. There is now a requirement to provide 10,830 dwellings within Hillingdon over the next 10 years, of which 2,950 are required to be delivered on small sites such as this one. The application proposals would make a valuable contribution towards meeting this requirement, without requiring the redevelopment of an undeveloped land. This approach, of making more efficient use of previously developed land, accords with local and national policy, and this is a matter which weighs heavily in favour of granting planning permission.
- 1.4 The proposed development would provide a good standard of accommodation for its new residents. It would, for instance, provide two flats which would be entirely wheelchair accessible, and would benefit from their own disable car parking spaces within the site. It would also increase the amount of private open space available to residents within the site, through the provision of new roof gardens. In each of these respects the proposals would exceed policy requirements.
- 1.5 The application site is in a sustainable location, within and on the edge of Hayes town centre, which contains a good range of services and facilities. The site also benefits from good public transport services within easy walking distance, and a dedicated off-road cycle lane that runs past its frontage. The proposals would provide ample cycle parking, whilst limiting the car parking provision to less than one space per flat to encourage the use of more sustainable travel methods, in accordance with the London Plan's requirements.
- 1.6 We consider that this would be an entirely sustainable form of development, which would comply with local, regional and national policies taken as a whole. It would comply with the requirements of the development plan, and the proposals benefit from the presumption in favour of sustainable development. We consider that planning permission should accordingly be granted without delay.

2 Contextual Appraisal

Contextual Appraisal

2.1 The application site is located at 109 Coldharbour Lane. The site previously contained The Kings Arms public house, but this has since been demolished and replaced with a development comprising of 21 residential units and 430 square metres of non-food retail space. This has been built in accordance with planning permission 10954/APP/2011/1997.

2.2 The application site is in a sustainable location. It is within Hayes Town Centre, as defined by the Hillingdon Local Plan policies map. There are a wide range of shops and facilities available along Coldharbour Lane, and most are within an easy 250m walk of the site, as can be seen in Figure 1 below.

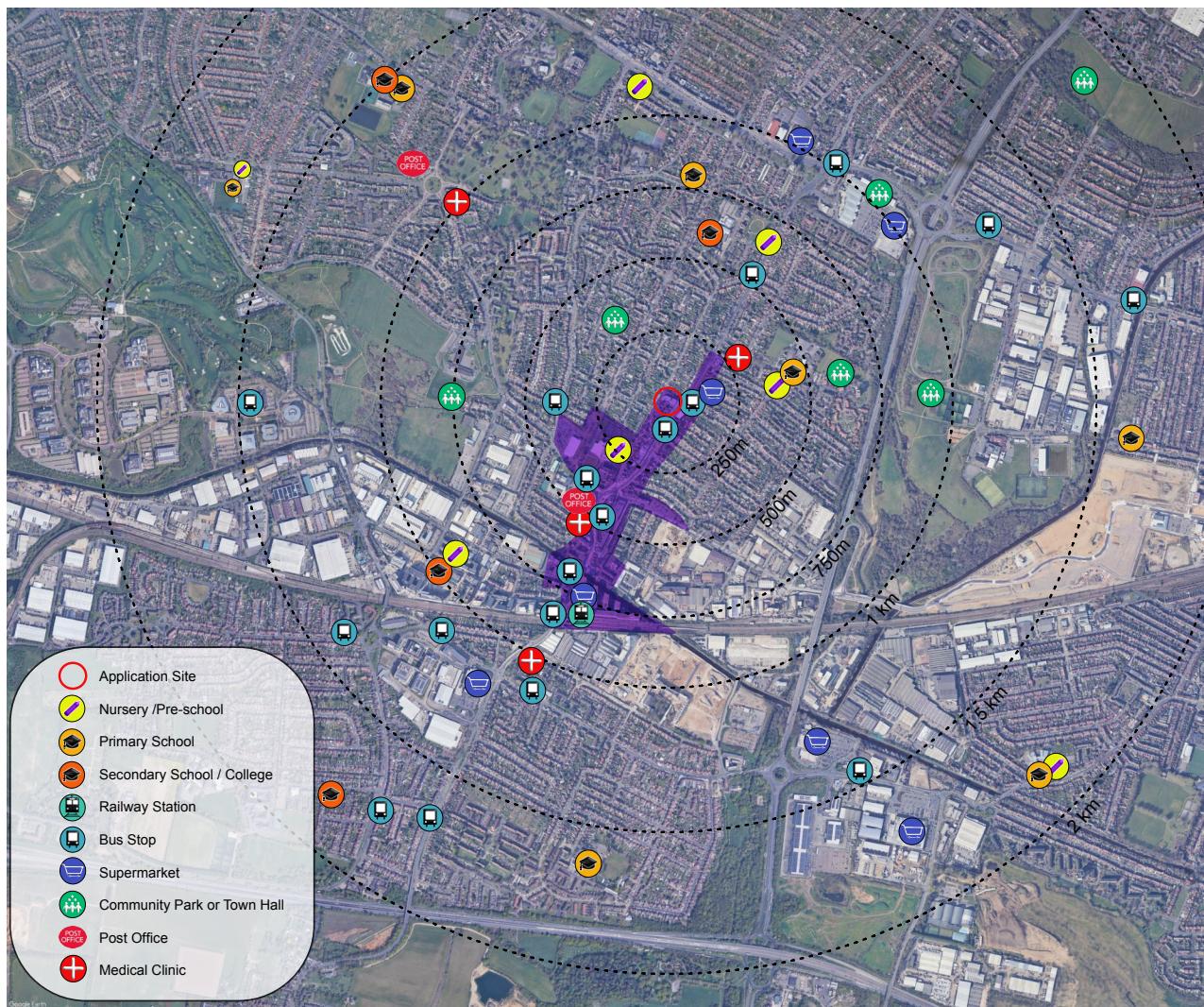


Figure 1: The site's location and local facilities

2.3 There are several bus stops within an easy walk of the site, the nearest is Hayes Town East Way (Stop W), just 80m to the north. There are many bus services that stop at East Way, and Figure 2 below shows the available services and possible destinations:

| Services | Destinations | Approximate Frequency |
|------------------------------|---|-----------------------|
| 140 (from East Way) | Hayes Town, Hayes and Harlington Station, Northolt Station, South Harrow Station, Harrow Bus Station and Town Centre and Harrow and Wealdstone Station | 7 to 12 minutes |
| 350 (from Hayes Town Centre) | Stockley Park, West Drayton Station, and Heathrow Airport Terminal 5 | 20 minutes |
| 90 (from East Way) | Northolt Station, Hatton Cross Station, and Feltham Station | 10 minutes |
| U4 (from Hayes Town Centre) | Stockley Park Prologis Park, Harlington Pinkwell Infant and Junior School, Wood End Park School, Pield Heath Hillingdon Hospital, and Pield Heath Brunel University | 10-15 minutes |
| 278 (from Hayes Town Centre) | Heathrow Airport, Hillingdon Primary School, North Hillingdon Station, and West Ruislip | 15 minutes |
| E6 (from East Way) | Greenford Station, Greenford High School, Yeadng Tesco, Yeadng Retail Park, and Cranford Bulls Bridge Tesco | 12 to 15 minutes |

Figure 2: Local bus services

2.4 The table above clearly demonstrates that catching a bus either from East Way (80m from the site) or from within the town centre (150m from the site), there are a variety of towns, supermarkets, train stations and schools easily accessible by public transport.

2.5 The Hayes and Harlington railway station is just 850m from the site, or around 10 minutes' walk, and it provides a regular service to London Paddington. Other destinations include Heathrow Terminal 5 and Reading.

2.6 The application site is located in PTAL (Public Transport Accessibility Level) Zone 3. Below is an extract from the PTAL map, obtained from the Transport for London (TfL) website. Level 1 would indicate a relatively low level of access to public transport, whilst level 6 is the highest. A rating of level 3 indicates that the site is reasonably accessible, when compared with other

sites throughout London. It should also be noted that the map shows that the area along Coldharbour Lane to the south, and very close to the site, has a rating of level 4, whilst Hayes town centre has a rating of 6a, and this is only just over 200m from the application site. As such, it is clearly within a very accessible area.

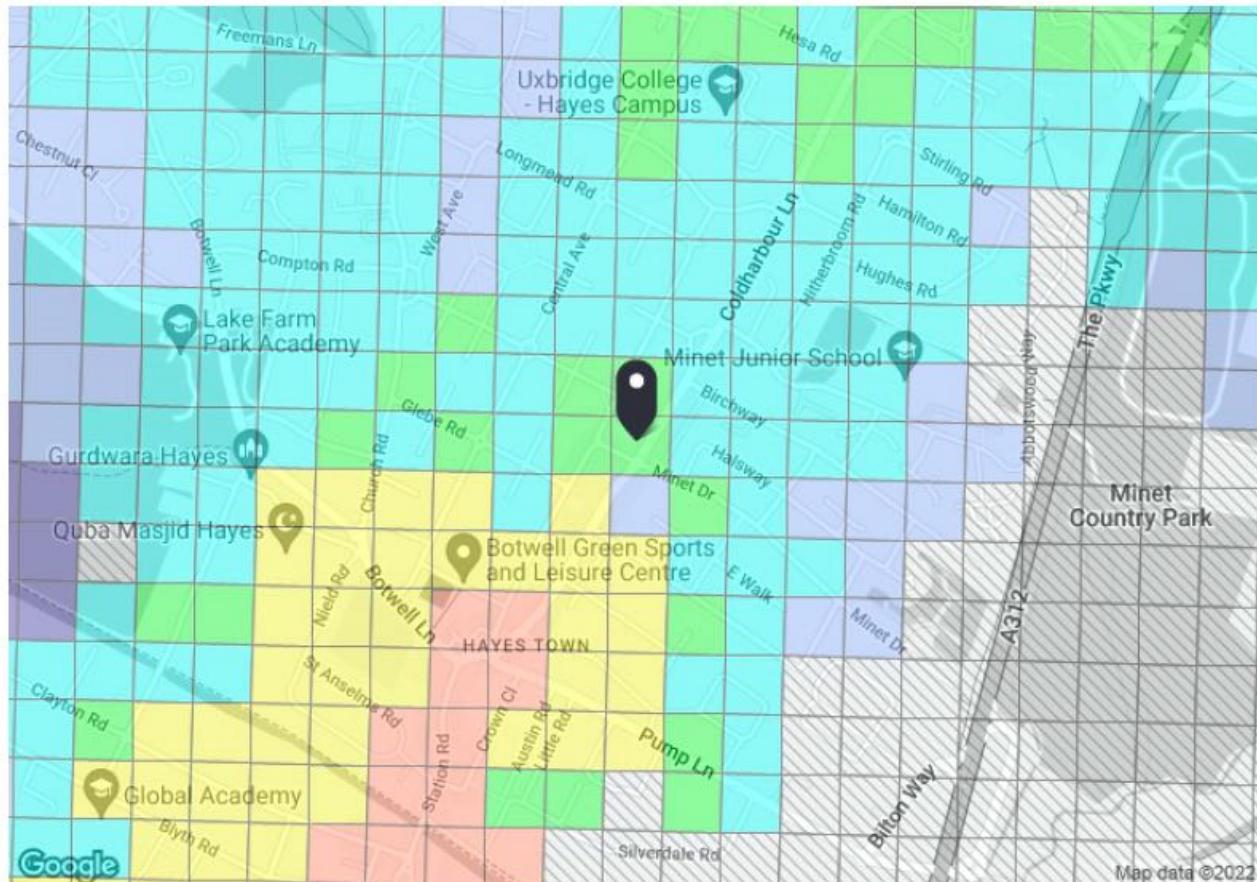


Figure 3: Extract from a PTAL Report from the TfL website, produced for 109 Coldharbour Lane

2.7 We can conclude that the application site has a good connection to sustainable modes of transport, not only are there bus stops very close to the site, shops and services are a short walk down Coldharbour Lane and there is dedicated cycle route that passes the site.

2.8 The site lies within the Hayes Opportunity Area. The London Plan designates “*Opportunity Areas*” as places where large scale development can provide space for a high number of jobs and homes, and encourages high density developments that may not be acceptable in other places.

2.9 The site is also located within an Air Quality Management Area (AQMA). As we explain in Section 4 below, the application proposals have been designed with this in mind.

The Application Site

2.10 The application site is located on the junction of Coldharbour Lane and East Way. As we have noted above, it is occupied by a mixed use development, comprising ground floor non-food retail units and 21 residential flats, with a basement car and cycle parking area. The building sits in line with the adjacent buildings, and set back from the road, with a wide pavement in front of it. This is clear from the aerial photograph in Figure 4 below.



Figure 4: Aerial photograph of the site and its surroundings

2.11 The site is largely surrounded by residential development on East Avenue and East Way and Coldharbour Lane to the north. In addition, many of the properties which line Coldharbour Lane, to the north and south of the site, have retail or similar uses such as cafés, take-aways and pubs, at ground floor level.

2.12 Coldharbour Lane predominantly consists of 2 and 3 storey buildings. Several of these could potentially be extended upwards under class AA of the General Permitted Development Order. This allows for upwards extensions of up to two storeys on top of detached buildings in commercial or residential use. This could potentially change the character of the area, and it is a matter which the Council have recognised in their formal pre-application advice.



Figure 5: The application site, viewed from Minet Drive



Figure 6: The application site, viewed looking south along Coldharbour Lane

2.13 The application site is a relatively prominent building on Coldharbour Lane, which has a positive effect on the character of the area, due to its attractive modern character and distinctive curved walls. It is appropriately taller than other 2-storey housing, due to its location on a main road, spacious setting and visibility, where it forms a local landmark. The existing building rises from 2 storeys to 4 storeys, with the top storey set back to reduce the building's apparent scale.

2.14 The building's main pedestrian entrance is from East Way, and vehicular access to the basement parking area is taken from Coldharbour Lane. The Design and Access Statement includes drawings of the consented floor plans for the existing building. These show that the building's ground floor comprises a mix of retail units, facing Coldharbour Lane, and residential accommodation facing East Way and East Avenue. The remaining floors are all

residential, and the second and third floor both step in so that highest point of the development faces Coldharbour Lane.



Figure 7: the application site viewed looking north along Coldharbour Lane

2.15 The existing development provides a combined private and communal outdoor amenity space of approximately 556 sqm, through a combination of private balconies and communal roof gardens.

3 The Proposed Development

- 3.1 The proposed development seeks an upward extension comprising 9 new residential apartments. This would create a new storey on top of the existing building, which would infill and extend the existing second and third floors and provide a new storey on top. The proposals would mimic the existing stepped design so that the highest part would continue to front the corner of Coldharbour Lane and East Way, and the building would step down in height towards East Avenue.
- 3.2 The images above at Figures 8 – 11 show the proposed building's elevations. These images are also included within the Design and Access Statement. They illustrate the dividing line between the existing building, and the proposed upward extension is marked by the dashed blue line.
- 3.3 The proposed extension has been carefully designed to mimic the arrangement of the lower floors, and complement the building's existing appearance. The extension on the second floor would not extend all of the way around to the neighbouring house on East Avenue, so as to maintain the existing two-storey relationship. There would be no south-facing windows on apartment 1, in order to protect the privacy of the neighbouring property on East Avenue, and the extension on the third floor would step back even further in this regard. These matters are discussed further in Section 4 below.
- 3.4 The proposed materials would match the lower floors. This would be a red brick finish, with and off-white render, grey cladding and slate grey door and window finishes. Further details are provided within the Design and Access Statement.
- 3.5 Only minor alterations are proposed to the existing basement, ground and first floors. Pedestrian access and vehicular access would remain as it currently is. Additional cycle stores would be provided in the basement, and existing car parking spaces would be allocated to the residents of the new flats. In addition, a new lift core would be provided to service the increase in the number of flats. This layout of the basement and other floors is illustrated within the Design and Access Statement.
- 3.6 No new car parking spaces are proposed, however there are already 23 car parking spaces available for the existing 21 units. This exceeds the current maximum standards set out in the London Plan, which were adopted several years after the development was granted planning permission. In line with the trend of the policies within the London Plan, it is proposed to assign 7 of the existing car parking spaces to the residents of the proposed 9 apartments. This would accord with the relevant standards, which require a maximum of 0.75 spaces for 1-2 bed homes, and 1 space per 3 + bedroom home within PTAL 3 areas. This would also encourage residents to use more sustainable modes of transport such as public transport and cycling, which are easily achievable in this location. This matter is also discussed within the Design and Access Statement, and below in Section 4 of this statement.



Figure 8: Proposed northern elevation, facing East Way

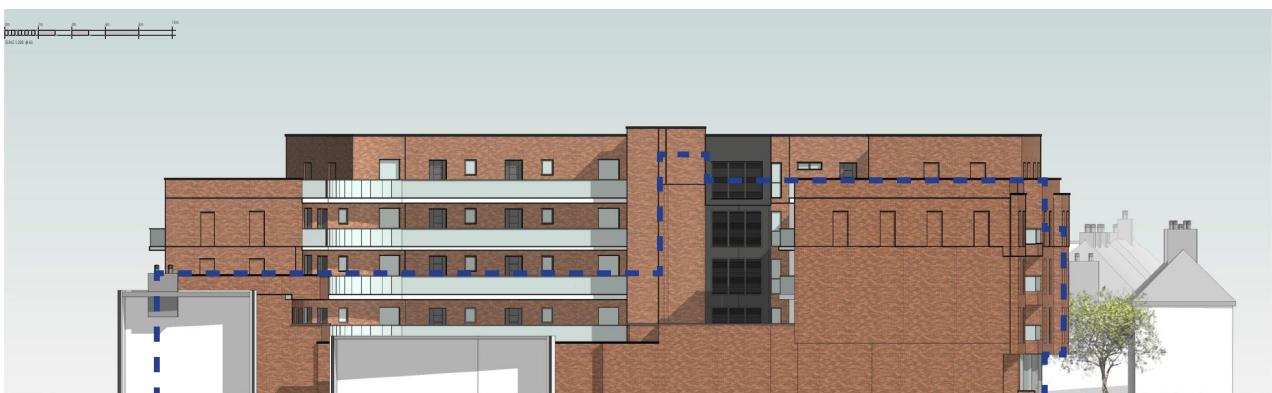


Figure 9: Proposed southern (rear) elevation



Figure 10: Proposed western elevation, facing East Avenue



Figure 11: Proposed eastern elevation, facing Coldharbour Lane

- 3.7 To continue to encourage travel by bicycle rather than by car, twenty new cycle spaces are proposed to serve the proposed 9 units. This accords with the standards of the London Plan. The cycle storage would be located within the basement where they could be securely locked up.
- 3.8 The waste and recycling bins for the proposed development will be stored in the existing bin store on ground floor. The bin store has sufficient room to accommodate this.
- 3.9 Two of the proposed apartments would be built to M4(3) building regulations. They would be wheelchair accessible. One would be provided on the second floor and the other on the fourth floor.
- 3.10 The new fourth floor would be limited to just two apartments, located on the corner of Coldharbour Lane and East Way. This floor would also be inset from the façade of the lower floors, to reduce its visual impact from the street.
- 3.11 Each of the proposed apartments would be provided with a private balcony and no. 4 would have its own private roof garden. The Hillingdon Local Plan sets out standards with regard to the size of amenity area that should be afforded to new residential units. Further detail on this are provided in the Design and Access Statement, and in Section 4 below. In essence, although the provision of unit 8 would result in the loss of an existing communal roof garden of 72.5 sqm, three new communal gardens that would equate to 342.05 sqm, would more than compensating for this loss. The total amenity space (consented and proposed) required by the local plan would be 540 sqm, the proposed scheme would provide a total of 898.5 sqm of combined private and communal amenity space. Not only would the generous amenity space benefit the residents of the development, it would also bring biodiversity and sustainable drainage benefits to the scheme.

4 Compliance with the Development Plan

- 4.1 Planning law requires that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise¹. The development plan for the London Borough of Hillingdon (LBH) comprises the Hillingdon Local Plan Part 1 – Strategic Policies (2012), the Hillingdon Local Plan Part 2 – Development Management Policies (2020), the West London Waste Plan (2015) and The London Plan (recently adopted, in March 2021). The Council has also produced a number of Supplementary Planning Documents, which are not part of the development plan, but which can inform the interpretation of its policies.
- 4.2 We have commented below on the policies which we consider to be of particular relevance to the application proposals. This application is also supported by other documents, some of which are not mentioned below, as they consider the application's response to specific matters, such as in relation to air quality, flood risk or transport.

London Borough of Hillingdon Local Plan: Part 1 Strategic Policies (November 2012)

- 4.3 Policy NPPF1 seeks to duplicate the presumption in favour of sustainable development, as set out within the NPPF, although it is based on the wording of the original (2012) version of the NPPF. It also confirms that the Council will take a positive approach to determining planning applications.
- 4.4 Policy H1 seeks to provide an average of 425 dwellings per year in the period of 2011-2026, equating to a total provision in this period of 6,375 dwellings. This is based on the housing target set out in the 2011 version of the London Plan. This target has now been increased to 10,830 dwellings for Hillingdon over the next ten years, covering the period 2019/20 – 2028/29 by the recently adopted London Plan²; this equates to 1,083 dwellings per year. With regard to the implementation of Policy H1, the Local Plan notes that the Council will adopt a number of measures, including *"ensuring development makes the most efficient use of brownfield land"*.
- 4.5 Policy H2 seeks the provision of affordable housing on sites capable of accommodating 10 or more dwellings. Nine dwellings are proposed, and the development is therefore not required to provide affordable housing.
- 4.6 Policy BE1 requires *"all new development to improve and maintain the quality of the building environment in order to create successful and sustainable neighbourhoods"*. It also requires new developments to achieve a satisfactory assessment against the latest Building for Life Standards, which are Building for Life 12 (January 2015), and they are considered in the table below. The application's performance is also assessed in terms of the traffic light assessment used by Building for Life, as red, amber or green.

¹ See Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

² Table 4.1 – 10 year targets for net housing completions (2019/20 – 2028/29), The London Plan (March 2021).

| Building for Life Criteria | | Application's Response |
|-----------------------------------|--|--|
| 1. | Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site? | The proposed development would not affect existing movement connections around the building. However, it would be well integrated with the existing building, by matching its design, materials and land use (residential). It has also been designed in a way which would ensure there would not be any unacceptable effects on surrounding development. |
| 2. | Does the development provide (or is it close to) community facilities, such as shops, schools, work places, parks, play areas, pubs or cafes? | The previously consented scheme proposes commercial units on the ground floor. This application does not propose to alter this. The commercial units would provide essential facilities for the local community. These could, for instance, be shops, offices or community uses. |
| 3. | Does the scheme have good access to public transport to help reduce car dependency? | The application site does have good access to public transport, with a mainline railway station within 1km of the site, and bus stops with 80m. It is also within an easy walking distance of a variety of shops and services just south of the site on Coldharbour Lane. |
| 4. | Does the development have a mix of housing types and tenures that suit local requirements? | This application proposes 9 new homes, consisting of 1 x 1 bedroom flats, 5 x 2 bedroom flats and 2 x 3 bedroom flats. Two of the new apartments would be built to wheelchair accessible M4(3) standards. This provides a range of units with 2 units suitable for disabled access. This would be a good range of accommodation, which would meet the needs of various people and households, including those seeking larger properties, in accordance with Policy DMH2 (see below). |
| 5. | Does the scheme create a place with a locally inspired or otherwise distinctive character? | The proposed development would have a distinctive character, with a high quality of architecture, which would respond to the better elements of the local character. The existing building has already been deemed to be of a good standard of design, suitable to the local area, and the extension has been designed to integrate seamlessly with the existing building. |
| 6. | Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates? | The scope of the proposed development is limited by the fact it is an extension to an existing building. It has nevertheless been designed to respect the local topography, and it would not result in any particularly notable change to the building's scale. The building's |

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| | | orientation is dictated by its context. It is not of a sufficient scale to have a significant effect on the local microclimate. |
| 7. | Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well? | The building has been designed to address the site's surroundings appropriately, with an attractive public façade on the street, matching that of the existing building. It would form a distinctive, positive addition to the street scene, which would help turn the corner. As the site is already developed, there is limited potential to add landscaping, other than in roof gardens, which would be provided. |
| 8. | Is the scheme designed to make it easy to find your way around? | The building's key features, such as its entrances, are easily legible. It would also aid legibility in the local area, by providing a building of distinction which would be visible from a number of local roads. |
| 9. | Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces? | The proposed development would not have any effect on the design of streets in the local area. |
| 10. | Is resident and visitor parking sufficient and well integrated so that it does not dominate the street? | As noted above, the existing car parking is contained within the basement. Seven of the existing spaces would be allocated to the proposed flats. The car parking would not dominate the street. The amount of car parking would accord with the London Plan's maximum standards, as is explained in the accompanying Design and Access Statement. |
| 11. | Will public and private spaces be clearly defined and designed to be attractive, well managed and safe? | Public and private spaces would be clearly defined and appropriately separated. Each flat would have a private balcony and access to several communal amenity areas. |
| 12. | Is there adequate storage space for bins and recycling as well as vehicles and cycles? | The basement would provide adequate secure storage space for bins and bicycles, which would be well integrated and easy to use. |

4.7 We consider that the proposed development would achieve a more than satisfactory score with regard to the Building for Life criteria.

4.8 Policy BE1 also sets out a number of criteria for new development, to ensure that it would improve and maintain the quality of the built environment. These are set out below, alongside the applications response.

| Policy BE1 Criteria | | Application Response |
|----------------------------|---|---|
| 1. | Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place. | We consider that the proposed building would be of a high-quality design and finish. The proposed extension has been designed to integrate sympathetically with the existing building, by using the same architectural style and materials. It would be an appropriate addition which would be in harmony with the character of the local area. |
| 2. | Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties. | The proposed extension would match the design and appearance of the existing building, which was itself considered by the Council to form a suitable addition to the local area, which would add visual interest and improve legibility. It would have an interesting and attractive design, and make good use of locally distinctive materials. It would make a positive contribution to the character of the local area. Its scale would remain appropriate for its spacious corner plot. |
| 3. | Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives. | The proposed development would be designed to Lifetime Homes standards. Two units would be wheelchair accessible. |
| 4. | In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time). | The proposed development is only for 9 dwellings. Nevertheless, the Building for Life standards are considered above, and the proposed development would achieve a more than satisfactory assessment rating. |
| 5. | Improve the areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance. | The application site is located in Hayes. The proposals have been designed to ensure that a high-quality environment would be created. The proposed development would not have any notable effect on the historic environment, and it is not close to any designated heritage assets. |
| 6. | Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with | No new routes would be provided within the proposed development. |

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| | interchanges, public transport, community facilities and services. | |
| 7. | Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art. | The public and private areas within the development have been designed to be of a high standard. They would be clearly separated and would have a good degree of functionality. They would also respect and enhance the local character. Landscaped roof gardens are proposed which would help to encourage local biodiversity. |
| 8. | Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals. | The proposed development would provide safe and secure private areas for amenity. The proposals also include secure cycle parking and storage, within the existing building. |
| 9. | Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas. | The proposed development is not on garden land. It would be on previously developed land, and would help to reduce the pressure for the redevelopment of garden land. The site is not in an area which is at risk of flooding, and the proposed development would not increase the risk of flooding. |
| 10. | Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. Achieve reductions in carbon dioxide emissions in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill. | The proposed development will meet or quite possibly exceed building regulation requirements in relation to energy efficiency and carbon emissions. The provision of new apartments will reduce the cost of heating the apartments below, as the building's thermal mass will be improved. The amount of car parking proposed is also appropriate, and it will not result in any increase in the number of spaces within the site, and so is unlikely to result in any material increase in carbon emissions generated by private car journeys. There would be limited construction waste, due to the nature of the development. |
| 11. | In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. | The proposed development is not for a tall building. Nevertheless, it would have a positive effect on the character of the local area, as is noted below. |

- 4.9 We consider that the proposed development complies with the requirements of Policy BE1.
- 4.10 Policy EM1 concerns climate change adaptation and mitigation. It contains a number of requirements, and these are addressed throughout this statement and within other documents supporting this application.
- 4.11 Policy EM6 seeks to restrict development which would be at risk of flooding, and to promote the use of sustainable urban drainage systems (SuDS) within new developments. The proposed development would be at a low risk of flooding, being located within Flood Zone 1. The proposals would not increase the risk of flooding, and existing drainage infrastructure will be utilised and adapted as necessary.
- 4.12 Policy EM8 concerns land, water and air quality, and noise emissions. The proposed development would cause any particular harm to local air quality, as it would not propose any increase in the number of car parking spaces within the site, but would instead make more efficient of those which are already available. The opportunity exists to provide electric vehicle charging points for an increased number of apartments in relation to this application, and this matter can be controlled by a planning condition. The proposed development is also not expected to have any negative effect on local water quality, and it would not affect contaminated land, as it would involve the extension of an existing building. The proposed residential use would be appropriate within a residential setting, whilst matters during the construction period can also be controlled by suitably worded planning conditions.
- 4.13 Policy T1 seeks to steer development to the most accessible locations. As we note in Sections 2 and 6, the application site is within a sustainable location, in which new residential development is entirely appropriate.

London Borough of Hillingdon Local Plan: Part 2 Development Management Policies (January 2020)

- 4.14 Policy DMH 2 requires a mix of homes of different sizes, to reflect the Council's latest information on housing need. The most recently published Authority Monitoring Report for the Borough (2019) notes that "*in Hillingdon the largest population is in the 35-39 age bracket (7.8%). These is also a largely elderly population with 9.9% of the population aged 70 or above*³". The report also notes that Hillingdon's latest Strategic Housing Market Assessment (SHMA) identified a significant need for larger 3 + bedroom dwellings. The application proposals have been designed to respond positively to the requirement of Policy DMH2, by providing a mix of 1, 2 and 3-bedroom apartments. Given the nature of the proposals, it is not possible to provide a majority of larger 3-bedroom homes, as there simply isn't space within the site, and there are limitations imposed by working within the confines of the existing building. However, the Applicant has been careful to provide a range of sizes of accommodation, with as many larger properties as can be accommodated within a viable development.
- 4.15 Policy DMH 7 requires the provision of affordable housing in developments of 10 or more dwellings. The proposed development is for only 9 dwellings, and as such no affordable housing is required.

³ Development Plan Authority Monitoring Report 1 April 2015 – March 2019, Hillingdon, paragraph 2.7.

4.16 Policy DMBH 11 concerns the design on the new development. The policy sets out several criteria with which the design of the development must comply. We discuss this further below.

4.17 Policy DMHB 16 requires new housing development to comply with the Local Plan's latest internal space standards, and in the case of major developments 10% of new housing should be accessible or easily adapted for wheelchair users. The proposed development would meet these space standards, and 2 of the 9 proposed units (22%) would be built to M4(3) building regulations and would be entirely accessible for wheelchair users.

4.18 Policy DMHB 17 relates to the Local Plan's Residential Density Matrix. The supporting text explains that the Council will apply the density standards within the London Plan (see below) flexibly, and that the density matrix forms a starting point for discussions on residential density, *"which should ultimately be determined by a design-led approach"*. This matter is discussed within the Design and Access Statement, which notes that the London Plan states that within central areas with a Ptal rating of 2-4 (the site is rated as 3), the density should be in the range of 300-650 habitable rooms per hectare; Table 5.2 of the Local Plan Part 2 sets a slightly higher density range for Hayes Town Centre, of 450-750 habitable rooms per hectare. The proposed development lies within both of these ranges, with a density of 520 habitable rooms per hectare. As we explain below, the Council have also accepted through pre-application that the design of the proposed development is acceptable.

4.19 The provision of good quality and useable private outdoor amenity space is controlled by policy DMHB 18. This matter is also discussed in the Design and Access Statement, which explains that the proposed level of amenity space, at 898.5 m², will exceed the policy's requirement, which is for a total of 540 m². This relates to the requirement for both the existing and new apartments, and incorporates both private balcony spaces and communal roof gardens. Of particular note in this regard are the 3 new roof gardens which are proposed, with an area of 342 m², compensating for the loss of one of the existing gardens which has an area of 72.5 m².

4.20 Policy DMHB 19 states that new major residential development, that would result in an occupancy of ten or more children will require children's play facilities on-site. Where this is not achievable a financial contribution would be sought towards the improvement of existing play facilities within the local area. It is anticipated that a suitable contribution can be secured through a s106 legal agreement.

4.21 Policy DMEI 2 concerns the reduction of carbon emissions. It requires all new development to make the fullest contribution to minimising carbon dioxide emissions, in accordance with London Plan targets. In accordance with this policy requirement, an Energy Assessment accompanies this application, which addresses this policy's requirements.

4.22 Policy DMEI 7 requires new development to retain and enhance existing features of biodiversity or geological value. There are no such features within the existing site. However, the provision of roof gardens provides an opportunity for net gains in biodiversity within the site, and similarly measures such as bird and bat boxes could be incorporated if necessary, and secured through an appropriately worded condition.

4.23 Policy DMEI 14 requires all new development proposals to demonstrate appropriate reductions in emissions, to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. It also requires new development to be at least air quality neutral, with appropriate mitigation measures and actively contributing

towards improvement in air quality within Air Quality Management Areas (AQMAs). The application site lies within an AQMA, and the required improvements can be secured through the provision of electric vehicle charging points within the existing car parking area. The proposed development would not result in an increase in car parking provision within the site, and it would not encourage an increase in car use within the new and existing apartments taken as a whole. The proposals could thereby accord with the policy's requirements.

4.24 Policy DMT 1 requires new development proposals to be in locations which local facilities are accessible by public transport, walking and cycling; this would be the case with the application site, as is explained in Section 2 above. It also requires equal access for all people, including inclusive access for disabled people; as we have noted above, this would be achieved, with all homes built to Lifetime Homes standards, and 2 of the 9 apartments to be built to M4(3) building regulations, making them accessible for wheelchair users. The policy also requires that there should be no significant adverse effect on local air quality or the strategic road network; again this would clearly be the case, with no increase in car parking provision within the site, and sustainable transport modes to be encouraged by the nature of the development and its location.

4.25 Policy DMT 2 concerns the highway impacts of new development proposals. The proposed development would utilise the vehicular access already consented and built scheme for the 21 units. The occupants of the new flats would be allocated 7 car parking spaces out of the existing 23 spaces already allocated to the residents of the property, and no new car parking spaces would be created. However, new cycle spaces are proposed which would encourage cycle use rather car use. The site has direct access to a designated cycle route on Coldharbour Lane, which connects to places of work, shops, services and facilities. The proposals would not change the already consented access and car parking arrangements and would bring the benefit of more secure cycle parking spaces.

4.26 Development proposals must also accord with vehicle parking standards in accordance with Policy DMT 6, and Table 1 of Appendix 3. This sets a maximum allowance for 1.5-1 space per 1-2 bedroom apartment, and 2 spaces per 3-4 bedroom apartment. It also sets a cycle parking requirement of 1 space per studio, 1 or 2 bedroom apartment, and 2 per 3 or more bedroom apartment. These standards have however been superseded by the more restrictive maximum allowances within the London Plan, which are noted below.

The London Plan (March 2021)

4.27 Policy GG2 encourages making the best use of land. This includes the development of brownfield land, prioritising sites which are well-connected by existing or planning public transport and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The application proposals would accord with these requirements.

4.28 Policy D6 requires certain housing quality and standard measures. This includes adequately sized rooms and functional layouts. If the dwellings cannot be dual-aspect, then dwellings must benefit from adequate passive ventilation, daylight and privacy, and avoid overheating.

4.29 Policy D7 requires at least 10% of dwellings to meet Building Regulation requirements M4(3); 2 of the 9 proposed dwellings (22%) would meet this requirement.

4.30 Policy H1 seeks to increase housing supply, by setting new housing completion targets for each Borough. The target for Hillingdon is to provide 10,830 dwellings over the plan period of 10 years. The policy states that this should be achieved through "*delivery-focused Development Plans*" and by optimising "*the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions*". The application proposals would make a positive contribution in this regard.

4.31 Policy H2 requires Boroughs to proactively support well designed new homes on small sites (below 0.25 hectares in size). Table 4.2 of the London Plan sets Hillingdon a target of 2,950 net housing completions on small sites in the plan's ten-year period. Again, a net increase of 9 new dwellings on this site would make a valuable contribution towards meeting this target.

4.32 Policy H4 concerns the delivery of affordable housing. As noted above, the application proposes 9 dwellings, and this falls below the threshold of 10 dwellings, meaning that no affordable housing is required in this instance.

4.33 Policy H10 requires the provision of a range of dwellings of different sizes. The policy sets out criteria by which the mix of units should be considered, including a need to have regard to "*the nature and location of the site, with a higher proportion of one and two bed units generally in locations which are closer to a town centre or station or with higher public transport access and connectivity*", and "*the aim to optimise housing potential on sites*". The site is in a sustainable location, within Hayes town centre and close to various sources of public transport. The application proposals would optimise the site's potential to provide new homes.

4.34 Policy T1 states that "*all development should make the most efficient use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes*". Policy T5 sets minimum standards for the provision of cycle parking in new development; the requirement for the proposed development would be for 19 cycle spaces, and it is proposed to provide 20 new cycle parking spaces, in addition to those which are already in place within the basement parking area.

4.35 Policy T6 states that the minimum necessary level of parking should be provided in new developments. Policy T6.1 sets out the maximum parking standards by which new residential development must not exceed. For 1-2 bedroom dwellings, a maximum of 0.75 spaces per are allowed, and for dwellings of 3 or more bedrooms, a maximum of 1 space is allowed. This would equate to a maximum of 7.25 spaces to serve the proposed development. The Design and Access Statement set out how 7 of the existing car parking spaces would be allocated to the proposed development, although no new parking spaces are proposed within the site.

Principle of Development

4.36 It has already been established that the site is suitable in principle to accommodate residential development, as it has been redeveloped for residential use, following the grant of planning permission in 2014 (application 10954/APP/2011/1997). This planning permission allowed for a mixed use of scheme of retail and residential. The approved development has been built.

4.37 The proposed development would provide further housing on a residential site in the existing urban area, and it would accord with the development plan, as we have outlined in Section 4. In these circumstances, it is important to ensure that the proposed development would make

an efficient use of land in this suitable location, to provide as much housing to meet London's need as possible, in accordance with both the London Plan, and national policy in the NPPF.

The Design of the New Development

Impact upon the Character and Appearance of the Area

4.38 Pre-application advice was sought from the Council on a very similar form of development to that now proposed. When considering the relationship of the proposed development on the neighbouring properties at East Avenue the Council noted the following:

"The stepping down of the building from 5 storeys on East Way to two storeys next the existing dwellings on East Avenue would ensure that the development does not appear as over dominant when viewed from the street."

4.39 This 2 storey relationship with the houses on East Avenue has been retained and we consider that the proposed development would be acceptable in this regard. We also note that there are no windows on the southern elevation of apartment 1, and this would avoid any overlooking of the adjacent housing in this direction.

4.40 The Council also noted that the new fourth floor would be set back from the front building line on the corner of Coldharbour Lane *"thereby reducing its visual impact"*.

4.41 With regard to the height of the proposed building, the Council noted the following:

"It is noted that since the original planning permission, new Permitted Development Rights have been introduced that allow buildings to extend up to 2 storeys. There are a number of two and three storey properties located on Coldharbour Lane that could benefit from these Permitted Development Rights to extend up to five storeys. It is therefore considered that the proposal to increase the height of the existing building would be acceptable on balance, particularly on the corner of Coldharbour Lane; the partial step down from five to four storeys along Coldharbour land would also assist in ensuring that the proposed development does not appear visually intrusive."

4.42 The Council's written advice concluded that the pre-application proposals would not appear to have a detrimental impact on the character and appearance of the immediate street scene and surrounding area. This application proposes a smaller form of development to that proposed at the pre-application stage; these application proposals would reach the same height as the pre-application proposals but would have a reduced bulk on the top three floors. We consider that the Council's favourable comments on the larger scheme indicate that the design and appearance of the proposals would be entirely acceptable. We agree with this view.

4.43 The proposed materials and architectural detailing would match those consented on the lower floors. In respect of the above, we consider that the proposed scheme would be acceptable in terms of its impact upon the character and appearance of the area and would accord with policies BE1 and DMHB 11 and DMHB 12 of the Hillingdon Local Plan.

Amenity

4.44 As set out in Section 4 above all of the proposed units would meet the minimum floor space standards set out in policy D6 of the London Plan. We have also explained that the amenity space which would be provided as part of the proposed development would exceed the Local Plan's requirements under Policy DMBH 18. As such, the proposed development would provide a material benefit when compared with the existing situation.

Privacy, Daylight and Sunlight

4.45 The existing building has a separation distance of at least 21m between habitable room windows. The proposed development would not extend beyond the existing building lines of the lower floors, meaning that similar separation distances would be provided, and the privacy and amenity of existing and future residents would be safeguarded. As we have noted above, the Council have concluded, through their pre-application advice, that the proposed extension to the building would not cause any unacceptable harm to any existing residents.

4.46 This application is also accompanied by a separate Daylight and Sunlight Assessment, which concludes that the proposed development would meet the requirements of the BRE Guidance. It would accord with Policy CMBH 11 in this regard.

Highways

4.47 As set out in Sections 3 and 4, there are no proposals to alter the existing vehicular access. Existing car parking spaces would be allocated to the residents of the proposed development in accordance with the standards of the London Plan.

4.48 At the pre-application stage, the Council's Highway Engineer assessed the proposed development, which at the time proposed a greater number of apartments (13 rather than 9), and came to the following conclusion:

"The proposal would have a car parking ratio of 0.67 car parking space for both the proposed additional and existing flats. Although there would be a shortfall of 2 parking spaces and an absence of a residents parking control scheme, given the PTAL 3 rating and the site's excellent access to local amenities and the use of parking controls along Coldharbour Lane, the Council's Highway Engineer considers that the proposed parking provision of 0.67 space/unit for the development would be acceptable in this instance and would not have a detrimental impact on street parking provision, congestion or local amenity."

4.49 These proposals would result in 0.77 space per unit. As we have explained in Section 4 above, this accords with the standards set out in the London Plan.

5 Material Planning Considerations

National Planning Policy Framework (July 2021)

5.1 The policies of the National Planning Policy Framework (NPPF) 2021 constitute important material considerations which must be taken into account in the determination of this planning application.

5.2 Paragraph 8 sets out the three aspects of sustainable development, which include economic, social and environmental objectives. The social objective includes a requirement “*to support strong, vibrant and healthy communities, by ensuring a sufficient number and range of homes can be provided to meet the needs of present and future generations*”. The environmental objective includes a requirement to make “*effective use of land*”.

5.3 Plans and decisions are required to apply a “*presumption in favour of sustainable development*”. This is set out at paragraph 11. For decision taking this means:

- c) “*approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

5.4 Footnote 7 clarifies that the policies referred to in d(i) are only those in the NPPF, and not those in development plans. It also clarifies that these are policies relating to various matters, including Green Belt land, Local Green Space, Areas of Outstanding Natural Beauty, irreplaceable wildlife habitats, designated heritage assets and areas at risk of flooding, none of which relate to this site.

5.5 Paragraph 38 states that “*local planning authorities should approach decisions on proposed development in a positive and creative way*”, and that they “*should seek to approve applications for sustainable development wherever possible*”.

5.6 Paragraph 60 states that it is the government’s objective to “*significantly boosting the supply of homes*”. In this context, paragraph 74 requires local planning authorities to identify a supply of specific deliverable sites for the immediate 5-year period.

5.7 Paragraph 69 requires local authorities to “*support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing*

settlement for homes". This application would help to meet the need for housing within an established residential area, by making efficient use of a windfall site.

5.8 Paragraph 105 states that "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health*".

5.9 Section 11 (paragraphs 119-125) concerns the need to make effective use of land. Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 120 states that planning policies and decisions should promote and support the development of under-utilised land and buildings. Paragraph 125(a) requires that new Local Plan policies should "*seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate*".

5.10 Paragraph 219 of the NPPF clarifies that development plan policies should be accorded "*due weight... according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)*".

The Need for Housing

5.11 There is a very pressing need for housing in London, which is not being met by the housing target set out in the latest iteration of the London Plan. The housing target set for Hillingdon is accordingly regarded as a minimum which should ideally be exceeded. A failure to meet housing need can lead to severe adverse social and economic consequences. This is recognised by the NPPF, which clearly identifies the importance of providing sufficient housing, and states that it is the Government's objective to significantly boost the supply of homes.

5.12 The Council's publication '*5 Year Supply of Deliverable Housing Sites*' (July 2021) reviews the Borough's housing target and its ability to meet the identified housing need. At the time of the review the Council claimed it was able to demonstrate a supply of housing for the Borough's own 10-year housing target (6.3 year housing supply). However, the Borough must also carry the burden of providing housing to help meet the wider needs of London, and the effects of migration between local authority areas. Taking into account the housing target set for Hillingdon in the new London Plan (2021), the new target for housing completions by the year 2028/29 becomes 10,830. This significantly increases the minimum level of housing required, and it has had the effect of reducing Hillingdon's demonstrable 5-year housing land supply from a previously claimed 21 years, down to 6.3 years (according to the Council's Annual Monitoring Reports).

5.13 Prior to its recent adoption, the London Plan's housing target was under significant scrutiny and objections during the Plan's development. Notably the Secretary of State for Housing, Communities and Local Government criticised the housing target, in an open letter addressed to the Mayor of London⁴. The Secretary of State noted that there is great need to provide more homes in London. He also noted that, in order to protect the countryside, housing development must be focused within urban areas, and "*this means densifying, taking advantage*

⁴ Letter addressed to Sadiq Kahn, Mayor of London from Rt Hon Robert Jenrick, Secretary of State for Housing, Communities and Local Government dated 13th March 2020 – included at Appendix A.

of opportunities around existing infrastructure and making best use of brownfield and underutilised land". The Secretary of State also noted that housing delivery in London has averaged at 37,000 new homes a year over the last 3 years, falling well short of the previous London Plan target (of 42,000 dwellings per annum, and against an estimated need for up to 49,000 dwellings per annum), and this has been reflected in an increase in house prices due to the demand for homes. The letter stated that the average house price in London reached £515,000 in 2018, which equates to 14 times average earnings (see below). It also noted that "*the housing delivery shortfall you have overseen has led to worsening affordability for Londoners; and things are not improving, with housing starts falling a further 28 per cent last year compared to the previous*". The Secretary of State also noted that the Planning Inspectorate found the new plan capable of only providing 52,000 homes a year, rather than the Plan's own identified need of 66,000 homes. The demand for homes in London is high and the identified provision and 10-year targets for Boroughs within the London Plan does not meet this demand.

5.14 As the Secretary of State has noted, house prices are an indicator of the balance of supply against demand, and where they are rising, it is clear that supply is outstripping demand. House prices in London are rising rapidly. This leads to worsening affordability and makes it more difficult for established communities to remain within an area. A good indicator of the affordability of housing is the ratio between lower quartile incomes and lower quartile house prices. This reflects the ability of people on the lowest incomes, who are generally in the greatest need of suitable housing, to afford to buy housing which meets their needs. This is illustrated in Figure 12 below.

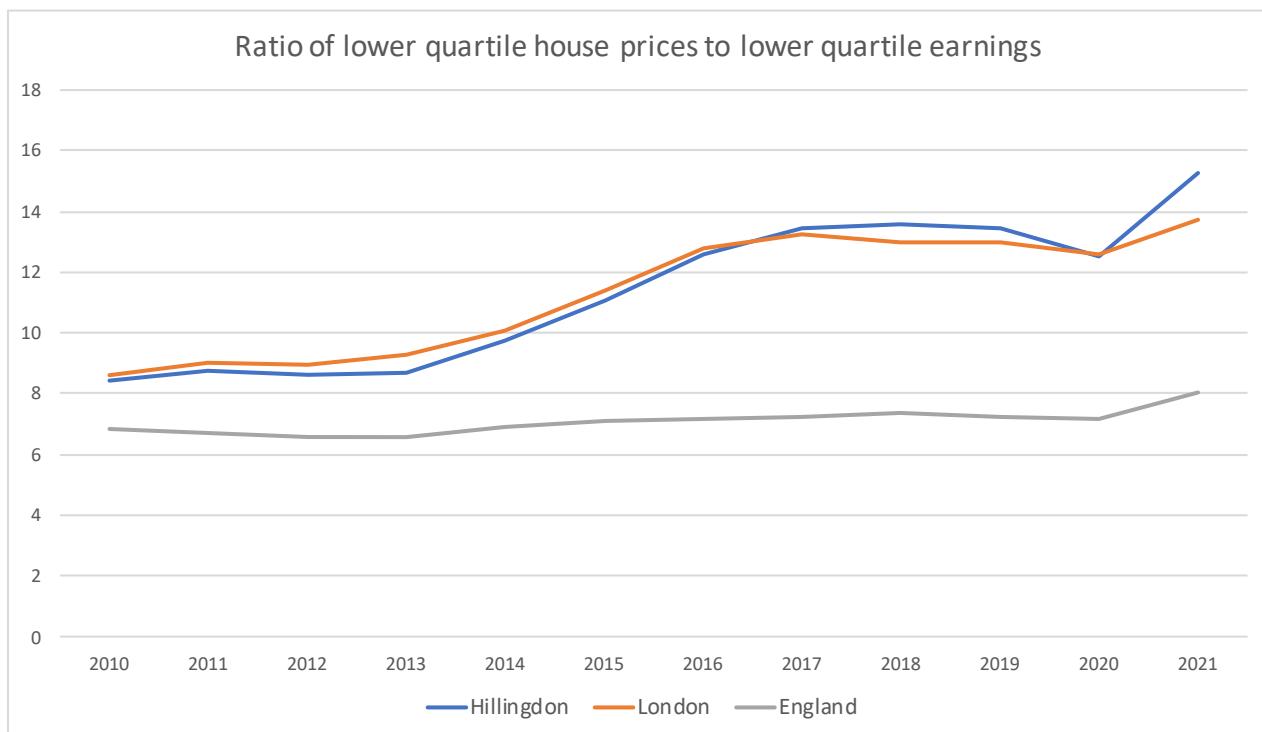


Figure 12: Ratio of lower quartile house prices to lower quartile incomes⁵

5.15 Figure 12 shows that by 2021 a lower-quartile house in Hillingdon cost 15.27 times the annual earnings of someone with a lower quartile income. This rate is worse than the average across London and is nearly twice the national average. This ratio must be considered in the context

⁵ Taken from *Office for National Statistics, Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2019*.

of the level of money which a mortgage lender may provide, which would typically be only up to 4 or 5 times a person's salary.

5.16 This clearly shows that there is an imbalance of supply and demand. In this context, it is important that as many houses should be provided as possible. It is only by increasing the supply of housing that rising house prices can be stabilised, and in the long term reduced.

5.17 The NPPF sets out the Government's objective, at a national level, to significantly boost the supply of homes (NPPF paragraph 60). National policy clearly places great importance on the need to provide land suitable to meet the need for housing. We consider that the pressing need for housing, and the new housing which the proposed development would provide, forms a significant material consideration, which weighs heavily in favour of the application proposals.

Social Sustainability

Mix of Housing

5.18 The proposed dwellings would provide a mix of 1, 2 and 3 bedroom flats. These have been designed to Lifetime Homes standards, so that they would be sufficiently flexible to allow them to cater for the needs of a range of people, from single people and young professionals, to small families and downsizers. As we have explained in Section 4 above, the proposals would accord with Policy DMH 2 in this regard.

The Provision of Housing

5.19 National policy recognises that the provision of a sufficient quantity and range of types of homes is important for the social element of sustainable development. NPPF paragraph 8 states that one of the overarching objectives to achieving sustainable development is to support "*strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*".

5.20 A lack of housing can lead to people living in accommodation which does not meet their needs. We consider that whilst planning applications for housing such as this should be seen in the context of the overall need for housing, as set out above, they should also be seen in terms of the real housing that they would provide for real people, and the direct benefits that they would bring to their new residents.

5.21 We have noted that the site is in a sustainable location, with shopping facilities, schools and employment near at hand. The application site is in an inherently suitable location to meet the housing needs of the local community.

Economic Sustainability

Job creation

5.22 The construction period for the proposed development would create employment, which has the potential to benefit those particularly in need, such as the unemployed and young people. A development such as this could provide several jobs during its construction, and it is likely that many of those employed on the site would be based locally.

Economic Development

5.23 New residential development is a key component that supports economic development within its local area. The role that housing plays, as a driving force for a successful economy, is one of the main reasons that Governments are keen to boost house building in times of economic stress. Insufficient housing can lead to serious negative social and economic effects, through worsening affordability and a lack of choice. For instance, a lack of housing restricts choice in the market, encouraging those who can move further (generally higher earners) to move away, whilst those who cannot are forced to live in housing which does not meet their needs. For these reasons, paragraph 82 of the NPPF identifies "*inadequate infrastructure, services or housing*" as a "*barrier to investment*".

5.24 Businesses will naturally be drawn to areas with a good supply of housing. They will want to be in an area where all of their employees can find suitable homes, which are affordable to them, and with as much choice as possible. A lack of housing generally, or of a particular type of housing, can deter businesses from locating in any one area. The quality of an area's housing stock can thereby have a direct effect on the area's economic prospects.

Environmental Sustainability

Energy Efficiency and Renewable Energy

5.25 The proposed development has been designed to meet the London Plan's requirement to reduce its carbon emissions by 35%, when compared to the 2013 building regulations. This could be achieved by minimising energy demand, through the use of energy efficient materials, fittings, and technologies, and using renewable energy sources. This would be a far more environmentally sustainable development, in terms of its ongoing impact, than the existing building, even though it was built relatively recently. Further detail regarding the energy efficiency of the proposals could be secured by a suitably worded condition.

Sustainable Travel

5.26 The application site's sustainable location, with regard to accessibility by walking, cycling and public transport, provides good potential to prioritise non-car uses. A limited amount of car parking would be provided, but the proposed development would not over-provide car parking, in accordance with the London Plan, and this would ensure that residents and customers of the commercial units would travel by sustainable means. As we have noted in Section 2, the site is within a short walking distance of Hayes town centre, along a good quality and direct route. There are nearby bus stops and it is also with a 10-minute walk of the railway station, with a high frequency service linking it to central London. The proposals also seek to promote cycle travel, with a good provision of secure cycle parking.

Air Quality

5.27 The proposed development would help to improve air quality in the local area, by increasing the amount of cycle parking and electric vehicle charging points available within the site. This would help to encourage travel by sustainable means, generating no emissions.

Biodiversity

5.28 The proposed development can benefit biodiversity within the site, for example through the provision of new planting on the roof gardens, which can provide food and habitats for a variety of species. This is also a matter which can be controlled by a suitably worded condition.

The Presumption in Favour of Sustainable Development

5.29 National policy sets out in Paragraph 11 the presumption in favour of sustainable development. The proposed development complies with the relevant local and national policies, and so benefits from this presumption. NPPF paragraph 11 directs that planning permission should be granted, provided that the proposals would not result in any adverse impacts which would significantly and demonstrably outweigh the benefits. As we have set out throughout this statement, there would be no such adverse impacts whilst there would be a number of benefits. As such, we consider that planning permission should be granted without delay.

6 Planning Balance

- 6.1 This planning application proposes to make a more efficient use of previously developed land, by providing new residential apartments on top of an existing building. This would increase the density of development, and provide new homes in a sustainable location within Hayes town centre. This would not only accord with the relevant policies of the Hillingdon Local Plan, but it would also accord with the London Plan, and national policy, both of which seek to boost the supply of new homes, and make more efficient use of land in sustainable locations and urban areas. Providing new homes in this area would help to reduce the demand for housing in less suitable locations, which are less accessible by public transport, and potentially the redevelopment of greenfield land.
- 6.2 The proposed development would bring a number of benefits. Chief amongst these would be the new homes it would provide; this would help to meet the need for housing identified by the London Plan, which is greater than can be met by the new homes it allocates. And it would help to address the poor affordability of housing in the local area, which has recently been worsening.
- 6.3 The proposed development would bring other benefits, such as by providing an increase in the amount of communal amenity space within the building, with new roof gardens. It would also help to encourage travel by sustainable modes of transport, with additional cycle parking in excess of the minimum requirement, and a more intensive use of the existing parking spaces within the building. It would also provide additional electric vehicle charging points, to increase the likelihood of residents using electric vehicles, which are themselves a sustainable form of transport.
- 6.4 The Council have confirmed in pre-application discussions that they consider the proposed development to be of an acceptable form of design. It would create a suitable extension to the existing building, complementing its architectural style and using matching materials. It would remain an entirely appropriate response to its context, as an attractive modern building with a distinctive curved façade, which would still be of an appropriate scale for a relatively prominent location within the street. It would continue to act as a positive local landmark, making the area more legible and navigable.
- 6.5 The application proposals accord with the policies of the development plan, and they benefit from the presumption in favour of sustainable development. We consider that the application should be granted planning permission without delay, in accordance with national policy.

